

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with
D.N.J.LBR 9004-1**

STEWART LEGAL GROUP, P.L.

Formed in the State of Florida

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Attorney for Newrez LLC dba Shellpoint

Mortgage Servicing (fka Specialized Loan

Servicing LLC) as servicer for Saluda Grade

Alternative Mortgage Trust 2021-FIG2

In re:

Alberta Gilbridge-Wonderlin

aka Alberta Wicker Gilbridge-Wonderlin

aka Alberta Wonderlin

aka Alberta Wicker Gilbridge

aka Alberta Wicker Wonderlin

aka Alberta Gilbridge

Debtor.

Chapter: 13

Case No.: 24-14704-JNP

Hearing Date: July 17, 2024

Judge Jerrold N. Poslusny Jr.

OBJECTION TO CONFIRMATION OF PLAN

Creditor, Newrez LLC dba Shellpoint Mortgage Servicing (fka Specialized Loan Servicing LLC) as servicer for Saluda Grade Alternative Mortgage Trust 2021-FIG2, files its Objection to Confirmation of Plan and states:

1. Creditor holds the note and first mortgage on the property located at 112 Thornhill Rd., Cherry Hill, New Jersey 08003.
2. Creditor filed Proof of Claim 5-1 in the amount of \$151,951.02, including an arrearage in the amount of \$24,793.48.

3. The Debtor's proposed Chapter 13 Plan includes an arrearage amount of \$22,761.08.

4. The Plan should be modified to conform to the arrearage amount on Creditor's Proof of Claim.

5. Moreover, the total arrearage should be paid in equal monthly payments, pursuant to Section 1325(a)(5)(B)(iii)(I) of the Bankruptcy Code.

WHEREFORE, Creditor respectfully requests the Court sustain this Objection and for such other and further relief as the Court deems appropriate.

Stewart Legal Group, P.L.,
attorney for Newrez LLC dba Shellpoint Mortgage
Servicing (fka Specialized Loan Servicing LLC) as servicer
for Saluda Grade Alternative Mortgage Trust 2021-FIG2

Dated: May 31, 2024

By: */s/Gavin N. Stewart*
Gavin N. Stewart, Esq.